

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	
)	
RAMIZ ZIJAD HODZIC,)	
a/k/a Siki Ramiz Hodzic,)	
)	Cause No. 4:15-CR-0049 CDP- DDN
SEDINA UNKIC HODZIC,)	
)	
NIHAD ROSIC,)	
a/k/a Yahya AbuAyesha Mudzahid,)	
)	
MEDIHA MEDY SALKICEVIC,)	
a/k/a Medy Ummuluna,)	
a/k/a Bosna Mexico,)	
)	
ARMIN HARCEVIC, and)	
)	
JASMINKA RAMIC,)	
)	
Defendants.)	

GOVERNMENT'S REPOSE AND NOTICE CONCERNING
THE REPORT AND RECOMMENDATION
ON THE ISSUE OF DETENTION AND PRETRIAL RELEASE

Comes now, the United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Matthew T. Drake, Assistant United States Attorney for said District, and responds to the Report and Recommendation (Doc. 141) issued by the Court.

On April 14, 2015, the United States received and reviewed a copy of the Report and Recommendation issued by the Court in the captioned matter. (Doc. 141) In compliance with

the Court's Report and Recommendation, the United States files this response and advises that the United States has no objection to the R&R.

Pursuant to the Report and Recommendation, a condition of the Defendant's potential pretrial release is that the defendant "must remain in the third-party custody of his wife and of two other residents of this District, acceptable to the Court with the advice of the Pretrial Services Office, who agree to supervise defendant and to report any violation of the conditions of release by him." (Doc. 141 at 10, ¶ 8). Pursuant to discussions with counsel for Defendant Armin Harcevic, the United States understands that approximately seven individuals have been proffered, or presented, to the Court as potential third party custodians. With the exception of Saed Harcevic, the United States has no objection to the individuals who may be nominated or appointed as a third party custodians.

The United States believes that Mr. Saed Harcevic, who is Defendant Armin Harcevic's father, would not be a suitable choice to act as a third party custodian. The United States is willing to supply argument and evidence concerning Mr. Saed Harcevic at a hearing or by way of Motion to the Court. However, based upon discussions with Defendant Armin Harcevic's counsel, a hearing or argument concerning Mr. Harcevic may be unnecessary.

Respectfully submitted,

RICHARD G. CALLAHAN
UNITED STATES ATTORNEY

/s/ Matthew T. Drake
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CERTIFICATE OF SERVICE

I certify that on April 17, 2015, a true and correct copy of the foregoing Government's Response was served on the Court's electronic filing system and served to all counsel.

/s/ Matthew T. Drake

Matthew T. Drake – 46499MO

Assistant United States Attorney